

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FORMAN HOLT ELIADES & RAVIN LLC  
80 Route 4 East, Suite 290  
Paramus, NJ 07652  
(201) 845-1000  
Proposed Special Counsel to Debtor  
Erin J. Kennedy (EJK-9227)

In re:

BAYONNE MEDICAL CENTER,

Debtor.

Case No. 07-15195 (MS)

Judge: Hon. Morris Stern

Chapter 11

Recommended Local Form: ☒ Followed ☐ Modified

**APPLICATION FOR RETENTION OF FORMAN HOLT  
ELIADES & RAVIN LLC AS ATTORNEYS FOR DEBTOR**

1. The applicant, Bayonne Medical Center, is the  

<input type="checkbox"/> Trustee:	<input type="checkbox"/> Chap. 7	<input type="checkbox"/> Chap. 11	<input type="checkbox"/> Chap. 13
<input checked="" type="checkbox"/> Debtor:	<input checked="" type="checkbox"/> Chap. 11	<input type="checkbox"/> Chap. 13	
  
2. The applicant seeks to retain the following professional Forman Holt Eliades & Ravin LLC to serve as:  

<input type="checkbox"/> Attorney for:	<input type="checkbox"/> Trustee	<input type="checkbox"/> Debtor-in-Possession
	<input type="checkbox"/> Official Committee of	
 <input type="checkbox"/> Accountant for:	 <input type="checkbox"/> Trustee	 <input type="checkbox"/> Debtor-in-Possession
	<input type="checkbox"/> Official Committee of	

☒ Other Professional:

- ☐ Realtor                      ☐ Appraiser                      ☒ Special Counsel
- ☐ Auctioneer                      ☐ Other (specify)

3. The employment of the professional is necessary because: Debtor intends to pursue the return of voidable (preferential) transfers made thereby and requires assistance of counsel.
4. The professional has been selected because: Significant successful experience in prosecuting avoidance actions in other proceedings.
5. The professional services to be rendered are as follows: Represent the estate in pursuing the recovery of voidable transfers made by the Debtor.
6. The proposed arrangement for compensation is as follows: 30% of the amount recovered, including the value (as distinguished from amount) of any claims waived by the settling parties, plus reimbursement of out-of-pocket expenses.
7. To the best of the Applicant's knowledge, the professional's connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, is as follows:
- ☐ None
- ☒ Describe connection: Professional may have represented creditors or professionals of the Debtor in other unrelated proceedings. Professional represented a landlord/creditor in the chapter 11 case, which matter is concluded.

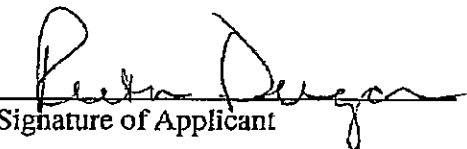
8. To the best of the Applicant's knowledge, the professional (check all that apply)

- ☒ does not hold an adverse interest to the estate.
- ☒ does not represent an adverse interest to the estate.
- ☒ is a disinterested person under 11 U.S.C. §101(14).
- ☒ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).
- ☐ Other, explain:

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

WHEREFORE, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Date: March , 2009

  
Signature of Applicant

Ruth Dugan, Chairperson of Board of Trustees  
Name of Applicant